

It is hereby stipulated and agreed that Ford & Harrison LLP is substituted in as counsel on behalf of all defendants in place of Fox Rothschild, LLP.

Dated: New York, NY October ____, 2007

[signatures appear on following page]

FOX ROTHSCHUD, LLP

Carolyn D. Richmond (CR-0993)

100 Park Avenue, Suite 1500 New York, New York 10017 Phone: 212.878.7983 Attorneys for Plaintiffs

Dated: October 3, 2007

FORD & HARRISON LLP

Philip K. Davidoff (PD- 7488) William Carmell (WC-7648)

100 Park Avenue, Suite 2500 New York, New York 10017 Phone: 212, 453, 5900 Attorneys for Defendants

Dated: October $\frac{3}{2007}$

SO ORDERED:

Philip K. Davidoff (PD-7488) William Carmell (WC-7648) FORD & HARRISON LLP 100 Park Avenue, 25th Floor New York, NY 10017 Phone: 212,453,5900

Fax: 212.453,5959 Attorneys for Defendants

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

COSTIN DUMITRESCU, MARIN ALEXANDRU, and JOSIP RICOV, on behalf ... of themselves and all others similarly situated,

Civil Action No. 07-3601 (PKL)

Plaintiffs.

-against-

MR. CHOW ENTERPRISES, LTD., T.C. VENTURES, INC., MC TRIBECA LLC. MR, CHOW NEW YORK ENTERPRISES, INC., WILDMAN GROUP, INC., and MICHAEL CHOW, individually,

Defendants.

ECF CASE

AFFIDAVIT OF CAROLYN D. RICHMOND, ESQ. IN SUPPORT OF APPLICATION OF FOX ROTHSCHILD, LLP FOR DISPLACEMENT AS COUNSEL OF RECORD FOR DEFENDANTS PURSUANT TO LOCAL CIVIL RULE 1.4

STATE OF NEW YORK) COUNTY OF NEW YORK) ss:

Carolyn D. Richmond, being duly sworn, deposes and says:

I am a Partner of Fox Rothschild, LLP, attorneys for all defendants in the abovecaptioned matter. I submit this affidavit in support of Fox Rothschild's application for displacement as counsel for defendants in the above-captioned action by Ford & Harrison LLP

pursuant to Local Civil Rule 1.4. The statements contained herein are based on my personal knowledge.

- 2. I have been informed by Philip K. Davidoff and William Carmell of Ford & Harrison LLP, 100 Park Avenue, Suite 2500, New York, New York 10017, that they and their firm are ready and willing to assume representation of defendants as soon as the Court grants Fox Rothschild's application.
- 3. The posture of the case is as follows: an initial pretrial conference is scheduled before this Court on October 4, 2007

Carolyn D. Richmond (CR-0993)

Sworn to before me this 3 day of October, 2007

